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CC: Steve

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July 30, 2001

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: James D. Smith, Senior Reclamation Specialist *JDS*

RE: 2000 Third Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/033-WQ00-3

1. Were data submitted for all of the MRP required sites? YES [X] NO []

Identify sites not monitored and reason why, if known:

2. On what date does the MRP require a five-year resampling of baseline water data.

See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.

Resampling Due Date

In the year preceding renewal, one sample at low flow and one at high flow for baseline analyses. Renewal submittal due 01/05/04, renewal due 05/05/04.

3. Were all required parameters reported for each site? YES [] NO [X]

Comments, including identity of monitoring site:

WCW-1, WCW-2, and WCW-4: Total Iron was not reported. The monitoring plan does not include Total Iron, a parameter required by the Coal Mining Rules.

WCW-1, WCW-2, and WCW-4: Field Water Temperature, Field pH, and Field Specific Conductivity were not reported.

4. Were irregularities found in the data?

YES ☒ NO ☐

Comments, including identity of monitoring site:

Cation-anion Balance was high in all three samples: the lab attributes this to analyses for total rather than dissolved metals and ions.

There have been only two previous samples from WCW-1 and WCW-2 and one from WCW-4 reported in the database, so there is no statistical basis for comparison.

5. Were DMR forms submitted for all required sites?

1st month, YES ☒ NO ☐

2nd month, YES ☒ NO ☐

3rd month, YES ☒ NO ☐

Identify sites and months not monitored:

6. Were all required DMR parameters reported?

YES ☒ NO ☐

Comments, including identity of monitoring site:

There was no UPDES discharge all three months.

7. Were irregularities found in the DMR data?

YES ☐ NO ☒

Comments, including identity of monitoring site:

8. Based on your review, what further actions, if any, do you recommend?

Total Iron, a parameter required by the Coal Mining Rules, needs to be added to Table IV-10 (Water Quality Parameter List) in the Wildcat MRP.

Analyses should be done for both Total and Dissolved Iron and Total and Dissolved Manganese.

Table IV-10 isn't clear that, except for Total Iron and Total Manganese, analyses for metals and ions should be for dissolved rather than total concentrations: the operator needs to instruct the lab more carefully on analysis methods.

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